

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JAIMARIA BODOR, )  
individually and on behalf of all )  
others similarly situated, ) Civil Action No. 5-19-cv-05787-JMG  
Plaintiff, )  
 )  
v. )  
 )  
MAXIMUS FEDERAL SERVICES, INC., )  
 )  
Defendant. )  
===== )

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**[PROPOSED] ORDER REGARDING  
PLAINTIFF'S MOTION TO COMPEL PRODUCTION**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2020, upon consideration of Plaintiff's motion to compel discovery [ECF No. \_\_\_\_] and any response thereto, and for good cause shown, it is ORDERED that the motion is GRANTED as follows:

1. Defendant Maximus' objections that it cannot produce responsive documents to Plaintiff's Requests for Production until it obtains "approval" from the Department of Education are stricken.
2. Defendant Maximus shall produce the non-privileged documents it has identified as responsive to Plaintiff's Request Nos. 1, 3, 11, and 14 within one week of this Order.
3. Defendant Maximus shall begin rolling production of non-privileged electronically stored information ("ESI") responsive to any of Plaintiff's requests and shall complete production of such materials within one week of this Order.

4. If Maximus is unable to produce any such responsive documents or ESI prior to the deadline for Phase IA discovery, Maximus shall not be permitted to rely on those documents in any summary judgment motion on Phase IA issues.

By the Court:

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U.S. District Judge